

1 A I may have. I don't recall.

2 Q Did you demonstrate it to Mr. Hurst?

3 A Yes.

4 Q Could a signal be -- let me try it this way.

5 Could a signal be generated into a dummy load to simulate

6 over-the-air reception through space at the Monticello

7 station at the Fort Lee translator?

8 A I just thought I said you could do that if you had
9 this lead box and everything else. Sure.

10 Q Oh, so you could do it. Okay.

11 Well, have you ever generated a signal to simulate
12 over-the-air reception through space at the Fort Lee
13 translator?

14 A No that way, no.

15 Q Another way?

16 A When I had Franklin Lakes, I had a reception
17 problem, and I solved it a certain way.

18 Q Through the use of a dummy load?

19 A Yes.

20 (Pause.)

21 MR. ARONOWITZ: Off the record for one moment,
22 Your Honor?

23 JUDGE STEINBERG: Okay.

24 (Pause off the record.)

25 JUDGE STEINBERG: On the record.

1 BY MR. ARONOWITZ;

2 Q Mr. Turro, I believe you were here when -- well,
3 you may have heard or read Mr. LaFollette's testimony to the
4 fact that he could not receive WJUX at Fort Lee?

5 A That is correct.

6 Q Okay. Do you have any explanation for why that
7 was the case?

8 A Very many.

9 Q Go ahead.

10 A The first one is that he wasn't using a proper
11 receiver. You have to use a specific receiver to do that.
12 The second one is, and I feel strongly about this, that one
13 of the reasons that there is reception of 99.7 and 99.3 in
14 that hot spot is because there is something shielding the
15 signal from WBAI at 99.5. He didn't have that opportunity
16 where he was at the roof top.

17 Q You just referred to the hot spot in relation to
18 two frequencies, and I know one of them is Monticello.
19 What's the other one?

20 A The other one is -- I don't know what the call
21 letters are as we sit here, but there is a 120-watt FM radio
22 station in stereo, it plays country, it's in Ellenville, New
23 York, at 99.3.

24 Q Okay. Okay, I just wanted to make sure that it
25 was not one of the trans -- it not on the frequency. Thank

1 you.

2 Is part of the reason that Mr. -- do you believe
3 that part of the reason that Mr. LaFollette could not
4 receive WJUX in Fort Lee -- strike that.

5 Is one of the key elements to your reception of
6 the Monticello station at the Fort Lee translator the hot
7 spot?

8 A Is one of a handful, yes.

9 Q Without the hot spot, could the signal be
10 received?

11 A I think you probably could with a filtering, yeah.
12 Just so we're clear here, what we are referring to on this
13 hot spot is you don't need any filtering at all.

14 Q Right. But absent the hot spot what would -- what
15 would be the impact on the reception of the signal absent
16 the hot spot, with or without filters?

17 A All you would hear was splatter from WBAI.

18 Q Okay. And when you say you would hear splatter,
19 that would be --

20 A The engineering term is "cha-cha."

21 Q Okay. If I heard "cha-cha," if I heard that, I
22 would be listening to the Fort Lee translator and I would be
23 hearing --

24 A "Che-che-che-che."

25 Q Degradation of audio?

1 A Yes.

2 Q Some perceptible -- okay.

3 MR. NAFTALIN: Now, I object to part of the form
4 of that question because implicit in there was filtering and
5 not filtering, and the answer -- it's not clear what the
6 answer was directed to and which part of that question.

7 MR. ARONOWITZ: Assume -- all right, thank you.

8 MR. NAFTALIN: Sure.

9 BY MR. ARONOWITZ;

10 Q Assume there is no filtering. Is that the cha-cha
11 phenomenon?

12 A Yes.

13 Q Okay. Assume there is filtering. Less cha-cha?
14 More cha-cha?

15 A Probably no cha-cha.

16 Q Okay. Okay. Thank you.

17 Was the -- you've testified to the Pomona receive
18 equipment located in the Fort Lee basement?

19 A Yes.

20 Q Okay. At Mediterranean Towers.

21 A Yes.

22 Q Okay. Is reception of the Pomona translator
23 signal there in the basement aided by the use of a hot spot?

24 A The hot spot, if you want to call it that, is a
25 lot broader down there. By "a lot," what I mean is instead

1 of being this four square foot area, it's probably like a
2 six foot wall where you could move the radio along the wall
3 and it works.

4 And it's also important to note that you can drive
5 in your car and get it outside of the building too.

6 MR. ARONOWITZ: I would like to put in front of
7 you, and this is one that came in yesterday, Turro Exhibit
8 35, the supplemental statement of Herman Hurst.

9 Are you going to give that to him? Thanks. Mine
10 is all written on.

11 MR. NAFTALIN: Let me just represent that the copy
12 has T-35 in the corner. Other than that it's unmarked.

13 BY MR. ARONOWITZ;

14 Q Do you have it in front of you?

15 A Yes.

16 Q Have you seen this before?

17 A No.

18 Q Okay. Would you like to read the whole thing?

19 MR. NAFTALIN: Yes, he would.

20 MR. ARONOWITZ: All right, why don't you --

21 JUDGE STEINBERG: Go off the record and let Mr.
22 Turro read Turro No. 35.

23 (Pause off the record.)

24 JUDGE STEINBERG: Back on the record.

25 Mr. Turro is finished reviewing Exhibit 35.

1 BY MR. ARONOWITZ;

2 Q Mr. Turro, if you could turn to page 3.

3 A Yes.

4 Q And the third paragraph down, "One final point"?

5 A Yes.

6 A The second sentence, "While in the basement"?

7 A Yes.

8 Q Could you read that sentence that begins, "While
9 in the basement"?

10 A You want me to read the entire paragraph or just
11 the sentence?

12 Q Oh, just the sentence.

13 A Okay.

14 Q Okay. If you want to read the paragraph, if this
15 question causes you to want to read the paragraph, please
16 ask me.

17 The sentence says, "While in the basement of the
18 Mediterranean Tower Building observing the unusual (possibly
19 phenomenal) receive signal from Pomona displayed on the
20 inexpensive portable receiver."

21 Do you have an understanding of what Mr. Hurst
22 would mean by "possibly phenomenal"?

23 A It's pretty incredible that an inexpensive Radio
24 Shack radio will pick up 94.3 in the basement of that
25 building. I am amazed by it myself.

1 Q And is that reception aided by the use of the hot
2 spot that you -- in the basement, or is that unrelated?

3 A First of all, I never referred to the basement as
4 a hot spot. There is definitely a hot spot on the roof. Let
5 me --

6 Q Go ahead.

7 A That hot spot has been there for years, and it's
8 consistent, it has always been there. And the basement is a
9 much broader area. You have to realize there are a lot of
10 pipes down there. I mean, I don't know what's going on down
11 there. I really never gave it a lot of thought. I never
12 tested other frequencies in the basement either. But it is
13 pretty phenomenal, yeah.

14 Q Well, I'm not sure -- it's a phenomenal reception
15 or --

16 A Oh, yeah.

17 Q Okay. And is this phenomenal reception aided by
18 any phenomena like a hot spot? I mean, is that what all
19 those --

20 A I already said I can't answer. I mean, the one on
21 the roof I swear to because it's been so many years. In the
22 basement, it's -- when it's that broad, I don't know if you
23 would still call it a hot spot. I mean, now we're getting
24 into technicalities. I mean, it's probably about half the
25 size of this wall, which is maybe another 10 feet, eight

1 feet. If you walk along with the radio, there it is along
2 the wall.

3 JUDGE STEINBERG: Okay, let me just say half the
4 size of this wall, Mr. Turro was referring to the wall
5 behind me, and I am not a good estimator as to how long
6 things are, but this room is probably 30 feet wide; is that
7 correct? Anybody disagree?

8 THE WITNESS: So then it would be less. It would
9 be about a third of the wall then, Your Honor.

10 JUDGE STEINBERG: So it would be about 10 feet by
11 however -- a seven foot ceiling? Ten feet by seven feet?
12 Maybe we could have Mr. Aronowitz stand up.

13 MR. ARONOWITZ: I'm six feet. How is that?

14 JUDGE STEINBERG: It's about eight feet then.

15 MR. RILEY: What are the tiles? Does anyone know
16 what these are? These are two or two and a half?

17 THE WITNESS: Two by two.

18 MR. RILEY: That's what I thought. They were two
19 by two.

20 JUDGE STEINBERG: Well, anyway, it's maybe 15 by
21 15 area, would you say? Maybe a 15 by 15 foot area?

22 MR. ARONOWITZ: Let the record reflect everybody
23 is looking --

24 THE WITNESS: Your Honor, it's approximately a 10
25 foot area on the flat way..

1 JUDGE STEINBERG: Okay.

2 THE WITNESS: If this area is 24 feet, so it would
3 be about a third of this wall. It would be approximately
4 eight feet -- 10 feet.

5 BY MR. ARONOWITZ;

6 Q If Mr. Hurst referred to this as a hot spot, would
7 you have a problem with that?

8 A No.

9 Q Okay. And you were in the -- the Fort Lee
10 translator has been located in the Mediterranean Tower for
11 how long?

12 A Since 1986.

13 Q Okay. And it predated the reception of the
14 Monticello facility?

15 A Yes.

16 Q Okay. Did you determine whether there was a hot
17 spot on the roof prior to the Fort Lee translator carrying
18 the Monticello facility?

19 A Yes.

20 Q In what context? Or when?

21 A I did that approximately end of September,
22 beginning of October 1994.

23 Q Okay. So this was --

24 A Before XTM was on the air.

25 Q All right. But before that you never -- did you

1 ever have occasion --

2 A Didn't rally have a reason to, no.

3 JUDGE STEINBERG: XTM is 90 point something?

4 THE WITNESS: 99.7, Your Honor.

5 JUDGE STEINBERG: 99.7.

6 If XTM is not on the air, how would you know that
7 there was a hot spot for 99.7 on the roof? How would you
8 test for that?

9 THE WITNESS: Because I had a hot spot for a
10 station existing in Ellenville, New York, at 99.3. So if I
11 can pick up a station from Ellenville, New York, at 99.3,
12 that's in stereo, that's 120 watts, the odds are if you have
13 a 6,000 watt station that's in mono right on the other side
14 of WBAI it's going to work, and it does and it did and it
15 always has and it always will.

16 JUDGE STEINBERG: Is Ellenville, New York, near
17 Monticello?

18 THE WITNESS: It's on basically what we call the
19 same radio. This may be where Monticello is, and where Ms.
20 Friedman is maybe where Ellenville is. That may be off by a
21 few degrees, but it's basically the same path.

22 JUDGE STEINBERG: The geography between Ellenville
23 and Monticello is similar, identical or different from the
24 geography between Monticello and Fort Lee, if you get what
25 I'm asking?

1 THE WITNESS: Without --

2 JUDGE STEINBERG: In other words --

3 THE WITNESS: They are basically the same.

4 JUDGE STEINBERG: Because we had testimony from
5 Mr. Cohen that there were geographical things getting in the
6 way between Monticello and Fort Lee.

7 Now, if the Ellenville station, if those things
8 weren't in the way, then it would be a different story.

9 THE WITNESS: I believe that Ellenville has a fair
10 amount of height, and I really -- I never did a study on
11 this but the fact that it is a stereo station and it's 120
12 watts is what convinced me that WXTM/WJUX would work, and it
13 did.

14 BY MR. ARONOWITZ;

15 Q Mr. Turro, I think in your supplemental statement,
16 which would be Turro No. 32, you describe the equipment.

17 Do you have it on front of you?

18 A Yes, I do.

19 Q Okay. Do you see the supplemental statement of
20 Gerard Turro?

21 A Yes, I do.

22 Q And did you write this statement?

23 A My counsel, Mr. Naftalin, helped me in this
24 statement.

25 Q But you --

1 A Yes.

2 Q -- participated in the formulation?

3 A Yes.

4 Q Thank you.

5 In here you talk about, for example, installing
6 and changing filters over a period of time. Did you ever --
7 did you ever keep records of the installation of these
8 filers?

9 A The only records I kept are up here. I didn't
10 have to. They are mental notes.

11 JUDGE STEINBERG: "Up here," let the record
12 reflect Mr. Turro was tapping his head, and I assume "up
13 here" meant in your head, to keep the record straight?

14 THE WITNESS: In my mind, Yes, Your Honor.
15 Sorry.

16 BY MR. ARONOWITZ;

17 Q But do you have --- well, so there are no records
18 of purchases or installation or receipts for installation or
19 receipts for materials, those types of things?

20 A Not that I can recall, no.

21 Q And between October '94 and June '95, was it
22 necessary to make adjustments to the filters?

23 A To the filters? To the filters or to the
24 harmonic, to the -- the actual cavities, no. I mean,
25 actually, I don't think the cavities were installed until

1 May, the notch filters. What you're referring to is a
2 little blue box that we've got, and my mind just left me.
3 It's 2903. I can't remember exactly what we called it.

4 But, yes, I did --

5 JUDGE STEINBERG: Why don't you refer to your
6 statement?

7 THE WITNESS: I'm sorry.

8 MR. NAFTALIN: Mr. Turro, refresh your
9 recollection at any time you feel the need.

10 MR. ARONOWITZ: Right. Oh, absolutely.

11 THE WITNESS: The phase canceler needed very minor
12 adjustments periodically.

13 BY MR. ARONOWITZ;

14 Q Why?

15 A I think what would happen is the temperature in
16 the building would change, and the actual coils or whatever
17 is inside this thing would change value, and you would just
18 have to make a minor adjustment. And I think it was more a
19 question of the unit itself drifting than anything else
20 happening.

21 Q Well, if you didn't make the minor adjustment,
22 what would be the result?

23 A You would start to get a minimal amount of what we
24 call "cha-cha."

25 Q More cha-cha.

1 So that these adjustments were needed how often?

2 A As I recall, maybe once a month.

3 Q Okay. And did you keep any records of these
4 adjustments?

5 A No.

6 Q Okay. Any written records of these adjustments?

7 A No.

8 Q Okay. And did you discuss these adjustments with
9 anyone when you made them?

10 A I might have. I don't recall. I might have.

11 Q Did you discuss them with Mr. Hurst?

12 A After the fact, I might have. I don't recall.

13 Q Okay. Mr. Hidle?

14 A No.

15 Q Okay. Is it safe to say you -- well, were you the
16 only one that knew what the adjustments were?

17 A I'm it.

18 Q Okay. And then at some point, and I think it's on
19 page 3 of your statement, third full paragraph down, "In the
20 spring of 1995, I replaced the phase canceler with a 40 dB
21 notch filter."

22 Do you see that paragraph?

23 A Yes. Yes.

24 Q Do you know when in the spring of '95, best
25 guesstimate?

1 A May - June.

2 Q May - June, okay.

3 And no written records of that?

4 A No.

5 Q Okay. And a little later on in the second
6 sentence of that paragraph -- I'm sorry. Strike that.

7 You said, the next sentence, "The 40 dB notch
8 filter did not provide any significant change."

9 Did it provide any change?

10 A No.

11 Q So you would hear the same thing with the phase
12 canceler that you would hear with the 40 dB notch filter?

13 I asked that in reverse. Would you hear the same
14 thing on the 40 dB notch filter that you would hear on the
15 phase canceler?

16 A Yes, but no cha-cha.

17 Q Okay, no cha-cha.

18 JUDGE STEINBERG: So it produced no change but no
19 cha-cha?

20 THE WITNESS: What happened is, Your Honor, the
21 reason I put the filter in was so I wouldn't have to make
22 adjustments anymore.

23 BY MR. ARONOWITZ;

24 Q Did you find that you had to make adjustments?

25 A (A) I didn't have to make adjustments; and (b) if

1 I did, I couldn't make them anyway.

2 JUDGE STEINBERG: But not with the 40 dB notch
3 filers?

4 THE WITNESS: No, you can't make adjustments with
5 it. It is what it is.

6 MR. ARONOWITZ: Okay.

7 THE WITNESS: There are no adjustments.

8 BY MR. ARONOWITZ;

9 Q Turning to page 4, in late July '95, you replaced
10 the 40 dB notch filter with a connected pair of 30 dB notch
11 filters?

12 A That is correct.

13 Q Okay. You observed no change in signal quality,
14 so you heard the same thing?

15 A Exactly.

16 JUDGE STEINBERG: Why did you make that change?

17 THE WITNESS: What happened is I called them --
18 when I ordered the other filter, I called the manufacturer
19 up, and he said, "The best I can do for you at this point in
20 time is a 40 dB filter." So something had happened, one of
21 the connectors came loose on it or something or rather on
22 the 40 dB, Your Honor. So I called him up and ordered a new
23 connector. I said, "Geez, it would really be neat if you
24 made one bigger than this."

25 He says, "Ah, you know something? I think I can

1 gang two of these together. I've never done it before, but
2 I will gang two of them together, and you would even get
3 more protection with it." He says, "I'll tell you what, if
4 it doesn't work, send it back." And there is a great deal
5 of labor in assembling these things and making them work,
6 and if someone says, "Try it, it may even give you more
7 protection," you know, for free basically, send it on out,
8 which he did.

9 So he sent them to me and I installed it and it
10 worked as well as all the other ones did. And I kept it.

11 JUDGE STEINBERG: Are these custom made?

12 THE WITNESS: Yes.

13 BY MR. ARONOWITZ;

14 Q Was there any change as a result of the filters?
15 I mean, and let me explain my question. You said you
16 observed no changed in perceptible audio?

17 A Correct.

18 Q Is that correct?

19 A Correct.

20 Q Was there -- what was the benefit of -- was there
21 any benefit received as a result of going from the phase
22 canceler to the 40 dB to the connected 30 dBs?

23 A In terms of receiving audio from 99.7 FM, there
24 was no change. It was more of an engineering project for
25 me, a little toy to play around with. What I was trying to

1 do is get to a point where when you have the car radio when
2 you turn to 99.5 FM, it will be gone completely. And it was
3 just -- that's what I was attempting to do with it.

4 Meaning that if you were on the roof listening to
5 99.5 FM or on the 26th floor inside the little closet where
6 all this equipment is, if you go to 99.5 FM, it would be
7 nonexistent. It was just a engineering thing.

8 And I had another fear also, that at one point
9 because the building in Fort Lee gets hit by lightening from
10 time to time, that that hot spot might be hit and blow up
11 one of the filters. So I figured I would have a spare
12 filter sitting around too if I ever needed it.

13 JUDGE STEINBERG: Do you consider the whole
14 Jukebox Radio operation, namely, the Dumont studios, the
15 Pomona translator facilities, the Fort Lee translator
16 facilities, to be -- to use your term "a toy" that you would
17 play with?

18 THE WITNESS: As an engineer, yes.

19 JUDGE STEINBERG: You like puttering?

20 THE WITNESS: I love it.

21 BY MR. ARONOWITZ;

22 Q And, in fact, you said you tweak your --

23 A And sometimes I get myself into trouble doing
24 that, yes.

25 JUDGE STEINBERG: Explain that. There is legal

1 trouble and there is other kind of trouble.

2 THE WITNESS: No, no, no, I'm talking about
3 engineering trouble I apologize, Your Honor. No.

4 Should I answer the question?

5 JUDGE STEINBERG: Yes.

6 THE WITNESS: Okay, what happens is there is two
7 sets of audio processing units up there, and one of them
8 processes the Pomona audio, and the other one processes the
9 Monticello audio. And if you saw the video, it's got lots
10 of blinking lights and lots and lots of knobs. And as an
11 engineer, even in a New York City radio station, you like to
12 put headphones on and go up there and turn the knob and get
13 more base or get more highs or get more mid range or get it
14 as loud as you can legally and do all these things with it.

15 And sometimes what sounds good on a Wakman doesn't
16 sound good in your car radio when you leave. So that's
17 basically what I'm referring to.

18 JUDGE STEINBERG: Is it also true that you -- that
19 you -- well, forget that. That is withdrawn.

20 MR. ARONOWITZ: Okay.

21 JUDGE STEINBERG: That half a sentence of nothing.

22 BY MR. ARONOWITZ;

23 Q What about the receiving antennas either on Fort
24 Lee or Pomona, did you have a number of receive antennas,
25 mains, auxiliaries?

1 A Relate --

2 Q All right, for Pomona, let's take them one at a
3 time, for Pomona?

4 A No.

5 Q Did you ever change the antenna configuration,
6 either transmit, receive?

7 A The transmit -- I'm sorry -- the receive antenna
8 has been the same since day one. The transmit antenna was
9 hit by lightening a number of years ago, and I can't be
10 specific. It's a matter of record with the Commission. At
11 that point -- what was there originally was a three-bay FM
12 antenna which radiated approximately three watts. When the
13 antenna was hit by lightening, the FCC rules had changed
14 where instead of using a three-bay antenna, I could use a
15 single-bay antenna.

16 So what we did was I took the antennas down and
17 put up a new one at -- a single-bay antenna at 94.3, so it
18 was just more -- it made more engineering sense and it was
19 economically feasible to replace it with a single bay than
20 to get another three-bay antenna because we were allowed to
21 do that.

22 Q Do you know approximately when that happened?

23 A No.

24 Q '94? '95? Could it have happened between '94
25 and '95?

1 A It's a matter of public record because I had to
2 file an STA with the Commission to do this, which Mr. Hurst
3 has done. And I would just be guessing, but it is a matter
4 of public record.

5 Q Okay. Now, let's move to --

6 THE WITNESS: May we take a three-minute break?

7 JUDGE STEINBERG: Yes. Off the record.

8 (Whereupon, a recess was taken.)

9 JUDGE STEINBERG: Back on the record.

10 Mr. Aronowitz?

11 BY MR. ARONOWITZ;

12 Q With respect to network equipment up at
13 Monticello, did that change between say September of '94 and
14 September of '95, just to give us a little leeway?

15 A There was additional equipment installed.

16 Q And did you do those installations?

17 A Yes.

18 Q And were there any -- with respect to the Fort Lee
19 translator, was there any change of equipment -- well, let
20 me be more specific.

21 Was there any change in receive antennas?

22 A From when to when?

23 Q From September of '94 to September of '95?

24 JUDGE STEINBERG: In Monticello?

25 MR. ARONOWITZ: In Fort Lee.

1 JUDGE STEINBERG: Oh, okay.

2 THE WITNESS: Sometime at the beginning of 1995, I
3 installed the other antenna in the basement to receive
4 Pomona. I may have changed audio processing around between
5 Pomona and Monticello, very little changes.

6 BY MR. ARONOWITZ;

7 Q Changes?

8 A In terms of audio processing equipment, limiters
9 and that type of things. I mean, not --

10 Q Would you tweak those and adjust those?

11 A Yes.

12 Q And at some point did the receive antenna or the
13 receive system located in the basement, did that continue to
14 this day in the exact same set up or was it --

15 A No.

16 Q -- taken apart?

17 A That ended approximately a year and a half back
18 from now.

19 Q Spring of '96?

20 A Around there, yes, it ended.

21 Q And during the time that there was receive
22 equipment in the basement, that was -- was that tinkered
23 with, tweaked, adjusted?

24 A No.

25 Q Do you have a copy of your direct statement in

1 front of you? That would be --

2 JUDGE STEINBERG: Turro 1.

3 MR. ARONOWITZ: -- Turro Exhibit 1.

4 MR. NAFTALIN: I gave him one at the beginning.

5 THE WITNESS: I don't know where it is.

6 MR. NAFTALIN: Right here.

7 THE WITNESS: Yes.

8 BY MR. ARONOWITZ;

9 Q Would you turn to page 17, and -- I'm sorry. I
10 misread my notes. I just put my glasses on. I meant 19. I
11 apologize. And it's on the carryover paragraph, the
12 sentence that begins, "On may occasions over time," could
13 you read that, those two sentences?

14 A Yes.

15 Q And the first sentence, "On my occasions over time
16 I have adjusted or tweaked the audio processing equipment,
17 controls, receive antennas in other facilities of the
18 Jukebox Radio, and the translators. Such adjustments have
19 caused perceptible changes in audio quality."

20 And I guess what I'm -- okay, what I am asking is
21 could you explain to us the perceptible changes in audio
22 quality that would occasion these adjustments?

23 A Sure. And the bulk of the adjustments were done
24 in Fort Lee. In Fort Lee, there is noise reduction
25 equipment, and what it does is in the event there is noise

1 either -- if there is noise coming from Pomona in 94.3 or
2 there is noise from 99.7 FM, there is an adjustment knob on
3 it to adjust the threshold of where to let certain audio in,
4 and then discriminate between the noise and the audio coming
5 in. And it's the fine levels that you try to get balance
6 between them.

7 And there are times when I would release it too
8 far, and there would be noise on it. It would get a little
9 noisy, and the thing is you wouldn't really hear it until
10 you had left the facilities, and "Oh, look what I did." So
11 you would have to go back and change it again.

12 And as I said earlier, I would be messing with
13 equalization controls also with the base, and the highs and,
14 you know. It could change your perception of what you
15 actually hear.

16 Q And you said that these were mostly in the Fort
17 Lee translator. Could you put a period of time on that?

18 A They are ongoing.

19 Q So from the beginning -- I don't want to say from
20 the beginning of the Fort Lee translator. From October '94
21 on --

22 A To today.

23 Q Okay. And no records necessarily kept of those
24 minor adjustments?

25 A No.

1 Q Okay. Let's stay with the direct exhibit and I'm
2 just going to ask you a couple of questions, and if you
3 would turn to page 4.

4 Are you there?

5 A Yes.

6 Q Okay. On the carryover paragraph, the sentence
7 that begins with, "Although I had no involvement," why don't
8 you read that paragraph to put it in context.

9 A I'm sorry, I don't see that.

10 Q I'm referring to the last sentence.

11 MR. NAFTALIN: Last sentence of the carryover
12 paragraph.

13 THE WITNESS: Just read the last sentence? Okay.

14 BY MR. ARONOWITZ;

15 Q Well, if you understand. You may want to read a
16 few sentences before to get a context.

17 (Witness reviews document.)

18 THE WITNESS: Okay.

19 BY MR. ARONOWITZ;

20 Q And the sentence that says, "Although I had no
21 significant involvement that I can recall," could you
22 explain the use of the word "significant" in this context?

23 You had some involvement; is that correct?

24 A Yes.

25 Q Okay. And did you -- in this, is this just with